

**Washington Department of Ecology  
Hazardous Waste & Toxics Reduction Program  
Compliance Report**

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**Site: John Henry Mine, Pacific Coast Coal**

**RCRA ID#: None**


Inspection Date: May 18, 2007  
Site Contacts: David Morris, General Manager  
Phone: (360) 886-1060  
Mailing Address: PO Box 450, Black Diamond, WA 98010  
Site Location: Black Diamond, WA  
At This Site Since: 1985  
Generator/Site Status: No RCRA Site ID number

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**Ecology**

Lead Contact: Barb Smith  
E-mail: [bsmi461@ecy.wa.gov](mailto:bsmi461@ecy.wa.gov)  
Report Date: May 31, 2007  
Report By: Barbara Smith

Phone: (425) 649-7026 FAX: (425) 649-7098  
Other Representatives: Trudy Harding

  
(Signed)

6-15-07  
(Date)

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Facility Background: The John Henry Mine is not operating as a mine currently. In the past, it operated as a surface coal mine. For several years, Pacific Coast Coal has been working on restoration of the mined areas. At a recent meeting, an employee from the US Department of Interior Office of Surface Mining (OSM), Glen Waugh, told Ecology employees (Dawn Maurer, Donna Ortiz, John Drabek, and others) about kiln bricks that had been sent to the John Henry Mine as fill and/or road bed material. The Ecology employees were told that the kiln bricks had originated from the Ash Grove Cement facility in Seattle. Ecology employees were concerned about the composition of the bricks, particularly if the bricks had heavy metal content that could enter the environment. Kiln bricks can sometimes contain chromium. Dawn Maurer referred the concern about the bricks to the Hazardous Waste and Toxics Reduction Program for follow up.


After receiving information about the bricks, I (Barb Smith) talked with Mr. Waugh at the Office of Surface Mining in Olympia (telephone 360-753-9538) for more background on the John Henry Mine and the bricks. I also contacted Mr. Gerry Brown at Ash Grove Cement (telephone 206-623-5596). Mr. Brown faxed me a copy of the MSDS sheets for the kiln brick used at Ash Grove (copy attached). Later, Mr. Brown was invited to a site visit to look at the situation at the mine and potentially take samples of the bricks. Mr. Brown agreed to come with us on the site visit. Mr. Waugh arranged for another member of the OSM staff, Mr. Gary Fritz, to go on the site visit.

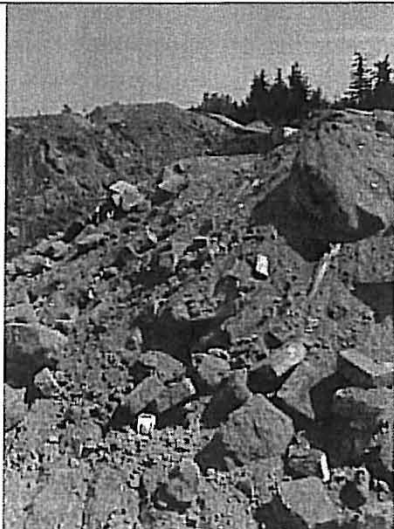
Inspection Summary:

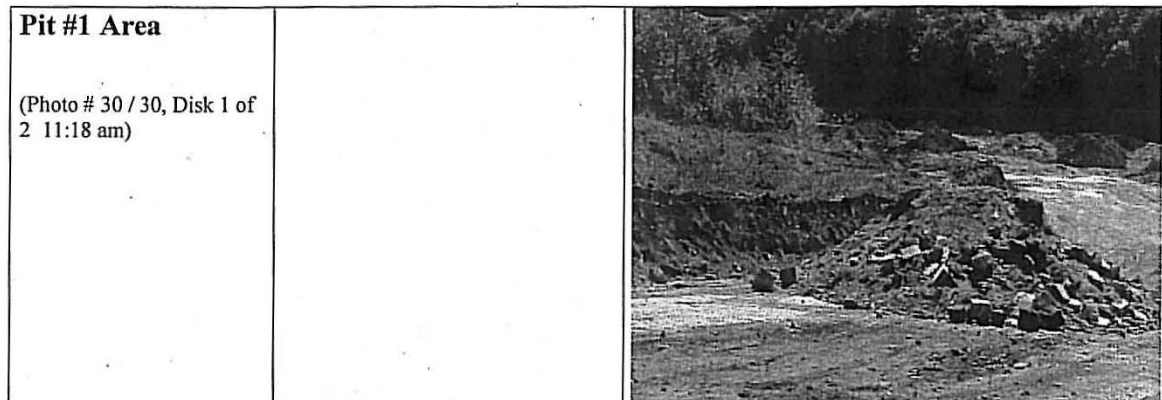
**Pre-Inspection Meeting:** Ms. Harding and I met Mr. Gary Fritz and Mr. Gerry Brown in Black Diamond. Mr. Fritz had worked with the mine for several years and reviewed some information he had about the mine. Mr. Fritz told us that the mine is doing reclamation of the area around Pit #1. He told us that their permit limits the amount of fill to be placed in the Pit #1 area at 500,000 cubic yards. He said to date they have placed approximately 470,000 cubic yards of fill. Mr. Fritz said that under the

permit for the mine, only certain companies, such as JR Hayes and Sons in Maple Valley, are authorized to haul in clean fill.

**On-Site:** After a brief meeting off-site, we drove to the John Henry Mine. We drove to the Pit #1 area and could see numerous piles of material that had been placed on the road in this area (see photos 1, 25, and 30 below).

<b>Pit #1 Area</b>  (Photo # 1 / 30, Disk 1 of 2 10:48 am)	Load of bricks and other material near Pit #1. The lake currently in Pit #1 is visible in the photo.	
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<b>Pit #1 Area</b>  (Photo # 25 / 30, Disk 1 of 2 10:57 am)	Concrete, bricks, and dirt make up some piles.  Picture rotated	
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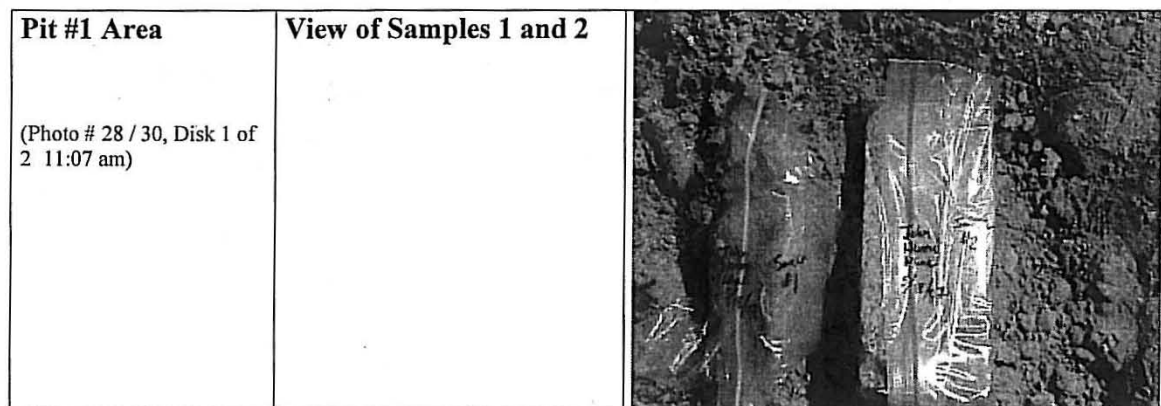


We asked Mr. Brown who did the hauling for Ash Grove Cement. Mr. Brown said that he thought LTI was the hauler that Ash Grove used most frequently.


After walking through the area and looking at the materials in the various piles, Ms. Harding and I took samples of three bricks from three separate piles.

Sample #1 was a used brick that was black, yellow, gray and white (see photo 28 below).


Sample #2 was a brick that was new and unused (see photo 28 below). Mr. Brown said that this piece probably had been extra brick sliced off of a larger piece during the installation of new kiln brick and was therefore, never used.



Sample #3 was a used brick that was black, dark golden-yellow, gray and white. The brick in photo #29 is similar to the material in Sample #3.

<b>Pit #1 Area</b>  (Photo # 29 / 30, Disk 1 of 2 11:13 am)	Brick is deteriorating. Similar to brick in Sample #3.	
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Some of the bricks were crumbling and deteriorating. This deterioration appeared to be caused either from exposure to weather and/or being driven over by trucks and other equipment (see photo 1 below).

(Photo # 1 / 7, Disk 2 of 2 11:21 am)	Brick deteriorating after being graded and after heavy vehicular traffic usage.	
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We concluded our inspection of the area and left the facility at approximately 11:55 am.

**Post Inspection Follow Up:** The three brick samples were sent to Ecology's Manchester Environmental Lab in Manchester, Washington for analysis. The analyses requested were total metals and Toxicity Characteristic Leaching Procedure (TCLP) metals.

### Compliance Problems

*The following conditions identified during the inspection on May 18, 2007 were not in compliance with Dangerous Waste and/or other environmental laws. Each problem is covered in three parts: (1) the citation from the regulations, (2) the specific observations from the inspection that highlight the problem, and (3) the corrective measures needed to fix the problem and achieve compliance. On the last page(s) of this report is a 'Compliance Certificate' which again lists these compliance citations and directives in a table. That certificate also lists the deadlines for the corrective measures to be completed. The certificate explains how to complete the form and return it to the Department of Ecology.*

No violations were observed during the inspection. This inspection was focused investigating the report of kiln bricks that were sent to the John Henry Mine and obtaining samples for analysis.

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**Smith, Barbara (ECY)**

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**From:** Gary Fritz [GFritz@osmre.gov]  
**Sent:** Monday, July 02, 2007 4:02 PM  
**To:** Smith, Barbara (ECY)  
**Subject:** RE: John Henry Mine - Brick Samples

Barbara, Do you have the results back on sand blank testing, yet.

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**From:** Smith, Barbara (ECY) [mailto:BSMI461@ECY.WA.GOV]  
**Sent:** Friday, June 29, 2007 4:01 PM  
**To:** Gary Fritz; Glenn Waugh  
**Cc:** Harding, Trudy (ECY)  
**Subject:** RE: John Henry Mine - Brick Samples

I heard back from the State of Washington Environmental Lab today that the kiln brick samples from the John Henry mine passed the Toxicity Characteristic Leaching Procedure (TCLP) for metals.

The chemist that I spoke with did not know the result on the total metals testing on the sand blank. (The total metals chemist had left for the day.) She said the analytical report would be verified as the next step in the process and then sent to me next week. I will send you a copy as soon as I receive it.

I will also make a note to call the lab on Monday and find out about the sand blank. I will let you know what I find out about that as well.

Barb

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**From:** Smith, Barbara (ECY)  
**Sent:** Tuesday, June 26, 2007 11:38 AM  
**To:** 'gfritz@osmre.gov'  
**Cc:** Harding, Trudy (ECY)  
**Subject:** John Henry Mine - Brick Samples

Hi Gary -

The lab called to say that all three brick samples came back with some chromium. The third sample had some cadmium also. The first two also had some zinc and other non-TCLP metals. These are all preliminary results.

They are going to run TCLP for chromium to determine if it designates as a hazardous waste. The preliminary results for that will be back later this week.

Unfortunately, the "sand blank" that they ran through the crusher (used to reduce the size of the bricks) to prove that the crusher was not the source of any metals also came back with chromium. So they are running the sand again without running it through the crusher to see if it is naturally high in chromium or if the crusher actually contaminated it. Those preliminary results will be back later this week as well.

I'll attach a copy of the report I wrote about the trip out there to take the sample in case you need it at any point.

Sorry that the results to this point are not more definitive. I will let you know what I hear from the lab on the further analysis.

Barb

<< File: John Henry Mine Report.pdf >>

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*Ecology protects and promotes wise management of our air, land and water to benefit current and future generations.*



**Smith, Barbara (ECY)**

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**From:** Gary Fritz [GFritz@osmre.gov]  
**Sent:** Tuesday, July 03, 2007 5:52 PM  
**To:** Smith, Barbara (ECY)  
**Subject:** RE: Pacific Coast Coal - John Henry Mine

Thanks, Barbara.

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**From:** Smith, Barbara (ECY) [mailto:BSMI461@ECY.WA.GOV]  
**Sent:** Tuesday, July 03, 2007 12:26 PM  
**To:** Gary Fritz  
**Cc:** Glenn Waugh; Harding, Trudy (ECY)  
**Subject:** Pacific Coast Coal - John Henry Mine

Gary -

Here are the results from the lab for the three kiln brick samples from the John Henry Mine.

I heard from the lab today that only Sample #2 (the unused brick) was run through the grinder for size reduction. And the chemist told me that the follow up analysis showed that the grinder was the source of the contamination in the sand blank. The sand that was analyzed that had not been run through the grinder did not have elevated chromium.

The chemist also told me that Sample #1 and Sample #3 were not run through the grinder. A mortar and pestle was used for size reduction. This method was effective on the used kiln brick samples.

Let me know if I can provide anything further on this at the moment.

Barb

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**From:** Covey, Pamela (ECY)  
**Sent:** Tuesday, July 03, 2007 11:04 AM  
**To:** Smith, Barbara (ECY)  
**Subject:** Emailing: l4r19409.pdf

<<l4r19409.pdf>>

Barb,

This is the short version of a report--by sample number. The reports I'll be sending are by parameter and contain lots more pages. Let me know if you need the other format also, but I'll be getting it in the mail today.

Pam

**Smith, Barbara (ECY)**

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**From:** Gary Fritz [GFritz@osmre.gov]  
**Sent:** Friday, July 20, 2007 6:08 PM  
**To:** Smith, Barbara (ECY)  
**Subject:** RE: Pacific Coast Coal - John Henry Mine

Thanks, Barbara.. I appreciate your comeback on this..

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**From:** Smith, Barbara (ECY) [mailto:BSMI461@ECY.WA.GOV]  
**Sent:** Thursday, July 19, 2007 3:17 PM  
**To:** Gary Fritz  
**Subject:** Pacific Coast Coal - John Henry Mine

Gary -

I got your voicemail about the bricks at the John Henry Mine. Because the testing has shown the bricks do not designate as Dangerous Waste, the Hazardous Waste Program does not have any further jurisdiction in the disposition of the bricks. I checked in with Dawn Maurer of Ecology's Solid Waste Program and she also thinks that because they do not designate as a dangerous waste, the Solid Waste Program will not be taking any further action in this situation.

Please, let me know if I can provide anything further.

Barb

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